

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

ERICK W. ZLUPKO and  
NENITA R. ZLUPKO,  
For themselves and for and on  
behalf of all others similarly situated,

Plaintiffs,

v.

WASHINGTON MUTUAL BANK, FA  
and WASHINGTON MUTUAL HOME  
LOANS, INC.,

Defendants.

CIVIL ACTION No.  
02-CV-4772-BMS

CLASS ACTION

**MOTION OF BARRY H. BOISE FOR ADMISSION  
PRO HAC VICE OF THOMAS M. HEFFERON  
AND JOHN C. EKMAN**

Pursuant to Rule 83.5.2(b) of the Local Rules of Civil Procedure of this Court, the undersigned, Barry H. Boise, who is a member in good standing of the bar of this Court, moves the Court to enter an Order admitting Thomas M. Hefferon, Esquire and John C. Ekman, Esquire, of the law firm of Goodwin, Procter & Hoar LLP, to practice before this Court pro hac vice as counsel for defendants Washington Mutual Bank, FA and Washington Mutual Home Loans, Inc. The facts supporting this motion are as follows:

1. The undersigned is an attorney-at-law of the Commonwealth of Pennsylvania, with the law firm of Pepper Hamilton LLP, located at 3000 Two Logan Square, 18th and Arch Streets, Philadelphia, Pennsylvania 19103-2799, and is a member in good standing of the bar of this Court. The undersigned and his firm will serve as co-counsel on behalf of defendants Washington Mutual Bank, FA and Washington Mutual Home Loans, Inc.

2. Thomas M. Hefferon is a partner in the law firm of Goodwin, Procter &

Hoar LLP. His address and telephone number are 1717 Pennsylvania Ave., N.W., Washington, D.C. 20006, (202) 974-1029. He is a member of the bar of the District of Columbia. He is in good standing in that bar, and no disciplinary or grievance proceedings have been filed or are pending against him. He has also been admitted to practice in the United States Supreme Court, Commonwealth of Massachusetts, Commonwealth of Virginia, U.S. Court of Appeals for the First Circuit, District of Columbia Circuit, Fourth Circuit, Sixth Circuit, Eleventh Circuit, and U.S District Courts for the District of Massachusetts, Columbia and the Western District of Michigan and Northern District of Illinois.

3. John C. Ekman is an associate in the law firm of Goodwin, Procter & Hoar LLP. His address and telephone number are 1717 Pennsylvania Ave., N.W., Washington, D.C. 20006, (202) 974-1172. He is a member of the bar of the District of Columbia. He is in good standing in that bar, and no disciplinary or grievance proceedings have been filed or are pending against him. He has also been admitted to practice in the bars of the State of Wisconsin, State of Minnesota, Northern District of Illinois, District of Maryland, Western District of Wisconsin.

4. Counsel for plaintiffs concurs in granting Messrs. Hefferon and Ekman's admittance pro hac vice.

---

Barry H. Boise  
PEPPER HAMILTON LLP  
3000 Two Logan Square  
Eighteenth and Arch Streets  
Philadelphia, PA 19103-2799  
(215) 981-4000

Dated: September 27, 2002

**CERTIFICATE OF SERVICE**

I hereby certify that the foregoing Motion for Admission Pro Hac Vice of Thomas M. Hefferon, Esquire and John C. Ekman, Esquire was served upon Counsel on this 27<sup>th</sup> day of September, 2002, via first-class mail, postage prepaid:

Stuart A. Eisenberg, Esquire  
McCullough & Eisenberg, P.C.  
530 West Street Road  
Warminster, PA 18974

PEPPER HAMILTON LLP

---

Barry H. Boise, Esquire  
3000 Two Logan Square  
Eighteenth and Arch Streets  
Philadelphia, PA 19103-2799  
215.981.4000

Attorneys for Defendants  
Washington Mutual Bank, FA and  
Washington Mutual Home Loans, Inc.